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Attorneys for Defendant LG Electronics, U.S.A., Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEVIN DROVER, individually and on behalf
 of all others similarly situated;

Plaintiffs,

vs.

LG ELECTRONICS USA, INC.,

Defendant.

Case No. 2:12-cv-00510-JCM-VCF

**STIPULATION TO STAY DISCOVERY
 PENDING RULING ON MOTION TO
 DISMISS**

The parties hereby stipulate to stay discovery, including the conference, discovery plan and report required by FRCP 26(f) and LR 26-1(d), and initial disclosures under FRCP 26(a), pending this Court's ruling on LG Electronics USA, Inc.'s Motion to Dismiss the Class Action Complaint ("Motion to Dismiss") (Doc. 19). The parties request this stay of all discovery in the interests of efficiency. The briefing on the Motion to Dismiss is expected to be completed no later than July 25, 2012. (Simultaneously with this stipulation, the parties have submitted a

1 stipulation, request and order extending Defendant's time to file a Reply in support of the Motion
2 to Dismiss from July 23, 2012 to July 25, 2012.)

3 In the event that the Motion to Dismiss is denied as to any claim(s), the parties agree to
4 conduct the conference required by FRCP 26(f) no later than thirty (30) days after the Court
5 enters an order on the Motion to Dismiss, and to submit the discovery plan and scheduling order
6 required by FRCP 26(f) and LR 26-1(d) no later than fourteen (14) days after the Rule 26(f)
7 conference. By executing this stipulation, the parties are not waiving their objections regarding
8 whether and to what extent discovery may be permissible in this action.

9 The undersigned represent this stipulation is not intended for purposes of delay.

10 DATED this 27th day of June, 2012.

11 McDONALD CARANO WILSON LLP

BAILEY KENNEDY

12 By: /s/ Kristen. Gallagher

By: /s/ William B. Federman (with consent)

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24 *Attorneys for Defendant LG Electronics, U.S.A.,*
25 *Inc.*

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____

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